



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105

NOV 03 2016

Via Electronic Mail

Mr. Jeffrey M. Stanek, PG, CEG, CHG
Director, Environmental Affairs
ITT Inc.
56 Technology Drive
Irvine, CA 92618

Re: Risk Based Disposal Application Former Die Cast Area 666 East Dyer Road Santa Ana, California.

Dear Mr. Jeffrey M. Stanek,

Thank you for working with the U.S. Environmental Protection Agency Region 9 (USEPA) to address the cleanup of polychlorinated biphenyls (PCB) found primarily in and around the former Die Cast building at the ITT LLC (ITT) property located at 666 East Dyer Road, Santa Ana, California (site). USEPA acknowledges ITT's work plan as the application and notification for disposal of PCB Remediation Waste. USEPA hereby approves ITT's work plan under TSCA 40 CFR 761.61(c). This approval applies only to PCB remediation waste.

The site is zoned for industrial use and occupies approximately 25 acres and has two primary buildings: the East Building and the West Building. The historic die cast operations, which are the source of PCBs at the site, were located only in a portion of the East Building referred to as the Die Cast Building. Die cast operations spanned approximately 23 years from 1959 until 1982. Hydraulic oil containing PCBs was used as a working fluid in the die cast machinery. In 1982, ITT conducted PCB decontamination, which included removal of all hydraulic oil and triple flushing the several die cast machines, and cleaning the entire inside of the Die Cast Building, including the floor. Die cast operations at the facility ceased in 2012, and all other manufacturing operations at the facility ceased in June 2016. ITT plans to demolish and remove essentially all above-surface structures and to sell the parcel for industrial and/or commercial non-residential use.

USEPA has received and reviewed ITT's September 15, 2016 *Risk-Based Disposal Application Former Die Cast Area* (work plan) prepared by AECOM Technical Services, Inc. ITT's workplan describes the remedial efforts to take place on site including the removal and disposal of contaminated soil, concrete and paint, and the installation of a Toxic Substance Control Act (TSCA) approved "cap", and Institutional Controls. ITT has conducted an environmental risk, and human health risk evaluation for leaving PCBs in place under an approved TSCA cap under the former die cast area. For the areas outside the TSCA cap, ITT is proposing a cleanup goal of 1 mg/kg (ppm) total PCBs. This cleanup goal will be based on an Exposure Point Concentration calculated as the 95% Upper Confidence Level of the mean using EPA's ProUCL software with no one sample exceeding 2mg/kg total PCBs. USEPA concurs

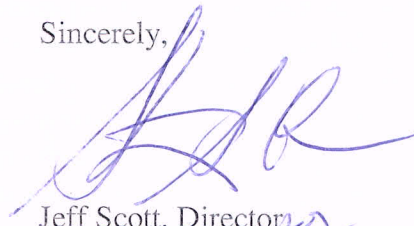
that the cleanup goals and the cap will not pose an unreasonable risk to human health and the environment. ITT has also identified PCB bulk product waste in building materials limited to paint and caulking material in the West building and in the East Building outside of the Die Cast Building. USEPA does not approve the disposal of PCB bulk product, however ITT shall dispose of PCB bulk product in accordance with TSCA 40 CFR 761.62 *Disposal of PCB bulk product waste*.

This Approval does not relieve the owner, ITT LLC from complying with all other applicable federal, state, and local regulations and permits. Departure from the conditions of the Approval without prior written permission from USEPA may result in the commencement of proceedings to revoke this Approval, and/or an enforcement action. Nothing in this Approval bars USEPA from imposing penalties for violations of this approval or for violations of other applicable TSCA PCB requirements or for activities not covered under this Approval.

This approval only applies to ITT LLC located at 666 East Dyer Road, Santa Ana, California. USEPA reserves the right to require additional characterization and/or cleanup of PCBs at the site if new information during additional site characterization, cleanup verification, and/or during future post-cleanup activities (e.g., redevelopment and post redevelopment) at the property shows that PCBs remain at the site above the approved PCB cleanup level. In addition, USEPA may require cleanup in areas immediately adjacent to the site if those areas are found to be impacted by PCBs from the site.

USEPA appreciates the opportunity to assist ITT LLC on the PCB cleanup to be conducted at their facility in Santa Ana, California. If you have any questions regarding this Approval please contact George Randell at 415.972.3439. Thank you for your cooperation.

Sincerely,

A handwritten signature in blue ink, appearing to read 'J. Scott', is written over the word 'Sincerely,'.

Jeff Scott, Director
Waste Management Division

Cc Via Electronic Mail Only

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